

EXHIBIT 9

From: [David Grassi](#)
To: ["Daniel Zemel"](#)
Cc: [Chad Diamond](#); [Nicholas Linker](#); [Salley Odom](#); [Chad Echols](#)
Subject: RE: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)
Date: Wednesday, September 1, 2021 4:12:00 PM
Attachments: [image001.png](#)

Daniel,

I understand you and Chad spoke earlier today. I know he then spoke to our client, but it is important I stay on track regarding the discovery matters as you guys discuss any potential for a resolution.

We initially noticed Mr. Hallager's deposition for June 2, 2021 and served notice of same on April 16, 2021, which is the same day we served written discovery requests. On that same day, I received an email from Steven Benedict indicating receipt of the deposition notice and saying "I will get back to you on if the date works for our client." I received no follow up from him regarding Mr. Hallager's availability. We were forced to postpone that initial deposition because we did not receive the responses to our written discovery in time to review them ahead of taking the deposition. After receiving those responses and going back and forth on them, I requested deposition dates for your client from you on August 11, 2021 and received no response. I therefore properly served the new Notice of Deposition on August 20, 2021 for a deposition date on Friday. Given our discovery deadline of September 17, I cannot agree to move the deposition again and at the last minute. I will be in Raleigh around 11:30 a.m. to start the deposition at noon, and, pursuant to the properly noticed deposition, I expect Mr. Hallager to be present to answer my questions.

As for my client's deposition, please provide me with a few dates when you are available, and I will check with my client to see if we can make one of them work.

As for the case deadlines, we would oppose an extension since they were extended previously.

Thank you,

David A. Grassi
Attorney
The Echols Firm, llc
224 Oakland Ave. (29730)
P.O. Box 12645
Rock Hill, South Carolina 29731
[803.329.8982](tel:803.329.8982)
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From: Daniel Zemel <dz@zemellawllc.com>

Sent: Wednesday, September 1, 2021 10:18 AM

To: Salley Odom <salley.odom@theecholsfirm.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Rene <rtrehy@beasontrehy.com>; David Grassi <David.Grassi@theecholsfirm.com>; Nicholas Linker <nl@zemellawllc.com>

Subject: Re: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)

Friday can't work for the deposition. I have tried to confirm the 17th. It should be fine but don't have a final answer yet.

The date you proposed giving me for the deposition also doesn't work for me due to other court conflicts.

September is a very difficult month and I think it makes sense to seek an extension here. I would also note that Experian will not be able to attend their deposition in September either. I think most things in this case need to occur in October due to scheduling conflicts and jewish holidays.

On Wed, Sep 1, 2021 at 8:47 AM Salley Odom <salley.odom@theecholsfirm.com> wrote:

Hi Rene,

Our client and carrier have requested the afternoon of the 17th beginning at 1:00. I'm waiting on Plaintiff's counsel to confirm that date and time suits them.

Thank you,
Salley

Salley Odom

Paralegal/Office Manager
224 Oakland Avenue (29730)
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From: Rene <rtrehy@beasontrehy.com>
Sent: Tuesday, August 31, 2021 4:13 PM
To: Salley Odom <salley.odom@theecholsfirm.com>
Cc: 'Daniel Zemel' <dz@zemellawllc.com>; 'Chad Diamond' <chad.diamond@gmail.com>; David Grassi <David.Grassi@theecholsfirm.com>
Subject: RE: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)

Hi Salley,

Has a decision been made regarding these holds?

Thanks so much,
René

From: Salley Odom <salley.odom@theecholsfirm.com>
Sent: Monday, August 23, 2021 11:40 AM
To: Rene <rtrehy@beasontrehy.com>
Cc: 'Daniel Zemel' <dz@zemellawllc.com>; 'Chad Diamond' <chad.diamond@gmail.com>; David Grassi <David.Grassi@theecholsfirm.com>
Subject: RE: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)

Ms. Trehy,

Can you place holds on your calendar for the morning of September 16th and the afternoon of September 17th? I will let you know as soon as possible if either of these times work for all of the parties.

Thank you,
Salley

Salley Odom
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From: Rene <rtrehy@beasontrehy.com>
Sent: Friday, August 20, 2021 4:35 PM
To: David Grassi <David.Grassi@theecholsfirm.com>
Cc: 'Daniel Zemel' <dz@zemellawllc.com>; 'Chad Diamond' <chad.diamond@gmail.com>; Salley Odom <salley.odom@theecholsfirm.com>
Subject: RE: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)

Hi David,

Thank you for your email. The most efficient way to schedule with me is via the online calendar below. I do have September availability before the deadline and am happy to mediate via Zoom.

You can hold a date directly through the calendar or email me and I will hold it for you.

I look forward to working with you and hope that you have a good weekend.

Best regards,
René

René Stemple Trehy
Beason & Trehy Conflict Resolution, LLC
Post Office Box 52270
Durham, NC 27717-2270
Beasontrehy.com

Link to online calendar: <https://www.ncmediators.org/rene-trehy>

From: David Grassi <David.Grassi@theecholsfirm.com>
Sent: Friday, August 20, 2021 3:43 PM
To: rtrehy@beasontrehy.com
Cc: Daniel Zemel <dz@zemellawllc.com>; Chad Diamond <chad.diamond@gmail.com>; Salley Odom <salley.odom@theecholsfirm.com>
Subject: Henry Hallager v. Account Resolution Services, et al., Case No. 5:20-cv-354-BO (E.D.N.C.)

Ms. Trehy,

Please see the attached correspondence regarding scheduling mediation in the above-referenced case. Salley Odom in our office is copied on this email and can assist with scheduling.

Thank you,

David A. Grassi
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Daniel Zemel, Esq.

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